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**Sent:** Thursday, April 28, 2016 11:27 PM **To:** Lee, Gary (ECY) <<u>glee461@ECY.WA.GOV</u>>

Subject: Comments re: 2016 Boatyard Permit for Port of Port Townsend

Gentlemen, I remain concerned by the conversations at Port public meetings when officials continue to express the certainty that the do-it-yourself yard must be eliminated, and imply that it is the unreasonable expectations of the DOE that makes this so.

I doubt that DOE has any such desire, however I will share the following to eliminate any possibility of omission.

Do-it -yourself is an important part of the Port of Port Townsend's appeal, especially to owners of wooden boats, whose extensive haul-outs can become very expensive if they cannot perform the work themselves, often a labor of love.

Interestingly, PoPT's website claims that PoPT operates the only diy boatyard in Washington. However, there are at least two other public Ports (Everett and Edmonds) that are environmentally compliant, and still allow do-it-yourself work. Having just visited the Port of Ilwaco, I'm not convinced that they are absolutely compliant, but obvious efforts are being made, and the Port Yard patrons are well versed on the BMPs.

If Port Townsend loses our do-it-yourselfers to these other Ports, we will lose a lot of the "accessory" income that accompanies visiting, and local, boat owners/workers while they are on the hard. This is a large economic driver in our region.

The Port of Port Townsend needs to look at ways the other Ports are accomplishing compliance. There are many strategies that have not been tried. Even a contest could be held to encourage development of innovative means for pollutant containment at the sources of boat refinish and repair work.

Further, installation of motion activated cameras to monitor "off hour" activities may be warranted, to enable enforcement of compliance to the BMPs at all times in all segments of the Yard, commercial and do-it-yourself. Conversations with workers in the Yard indicate that with few exceptions, do-it-yourselfers are no more guilty of infractions than the commercial workers. Lack of enforcement of the BMPs by the Yard manager is cited as the major challenge to our permit compliance, from work in the Yard.

If the Executive Director and commissioners choose not to enact the remedies that would allow our boatyards to continue in their traditional manner, they need to say so, not blame DOE for "forcing them" to close the Yard to do-it-yourselfers.

I remain grateful that your agency is making progress in reducing pollutants in our waters of the State.